## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE IMAX CORPORATION SECURITIES LITIGATION

Master File No. 06 Civ. 6128 (NRB)

# DECLARATION OF SAMANTHA LUNN IN SUPPORT OF DEFENDANT PRICEWATERHOUSECOOPERS LLP'S, AN ONTARIO LIMITED LIABILITY PARTNERSHIP, MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

#### PORTIONS REDACTED

- Samantha Lunn, pursuant to 28 U.S.C. § 1746, hereby declares:

  1. I am an associate in the law firm of Gibson, Dunn & Crutcher LLP, counsel to defendant PricewaterhouseCoopers LLP ("PwC-Canada"), an Ontario limited liability partnership, in the above-captioned action. I respectfully submit this declaration in support of PwC-Canada's Memorandum of Law in Opposition to Plaintiffs' Motion for Class Certification.

  2.

  3. Attached as Exhibit B is a true and correct copy of the Corrected Certificate of Named Plaintiff, dated April 29, 2010.

  4.
- 5. Attached as Exhibit D is a true and correct copy of the May 26, 2010 letter from Mark S. Reich to all counsel of record, regarding confidential sources.

#### PORTIONS REDACTED

- 6. Attached as Exhibit E is a true and correct copy of the August 9, 2006 IMAX Press Release.
- 7. Attached as Exhibit F is a true and correct copy of the March 29, 2007 IMAX Press Release.
- 8. Attached as Exhibit G is a true and correct copy of the July 20, 2007 IMAX Press Release.
  - 9.
- 10. Attached as Exhibit I is a true and correct copy of the March 16, 2007 IMAX Press Release.
- 11. Attached as Exhibit J is a true and correct copy of Lexis Nexis historical stock quotes for March 15, 2007; May 16, 2007; July 19, 2007; July 20, 2007; and July 23, 2007.

I hereby declare that the foregoing is true and correct to the best of my knowledge.

Executed on June 10, 2010.

/s/ Samantha A. Lunn
Samantha A. Lunn

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#### **PORTIONS REDACTED**

### **CERTIFICATE OF SERVICE**

I, Samantha A. Lunn, hereby certify that a true and correct copy of the foregoing was sent via the Court's CM/ECF system on June 10, 2010 to the following counsel of record:

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/s/ Samantha A. Lunn

Samantha A. Lunn